CHELMSFORD LOCAL PLAN REVIEW 2022-2041 EXAMINATION

HEARING STATEMENT - Matter 6
Site Selection - Sites 16A and 16B

Representor	Mr Rian Wispy
Representor number	1372718
Original Regulation 19 responses	PSQ25-3958 and PSQ25-88 (Site 16A); PSQ25-3960 and PSQ25-89 (Site 16B)
Matter	Matter 6 - Site Selection - Sites 16A and 16B
Participation	Written representations only - not attending the hearing sessions

1. Scope and relationship to original representations

This statement supplements, and should be read together with, my duly made Regulation 19 representations concerning Sites 16A and 16B. Those representations raised environmental impacts, biodiversity and ecological considerations, infrastructure, development impacts and the adequacy and effectiveness of safeguards within the Local Plan. This statement does not withdraw or replace those representations and is confined to the Inspectors' questions that engage those existing concerns.

MIQs 6.1, 6.6 and 6.8 - site selection, safeguards and soundness

The site-selection process should demonstrate how environmental, ecological, infrastructure and development impacts were weighed and how alternatives were assessed. Further safeguards are necessary where the site policies do not secure early assessment, mitigation and infrastructure delivery.

The policies must be effective rather than relying on later assessment to resolve issues that are material to the acceptability or deliverability of the allocations.

Sites 16A/16B questions (a)-(c) - selection, status, capacity and supporting requirements

The justification for selecting Sites 16A and 16B and for their capacities should be read alongside the constraints and infrastructure required to support them. Capacity should not be treated independently of the environmental and infrastructure evidence.

Sites 16A/16B questions (e)-(g) - highways, Junction 19 and sustainable travel

The Plan should establish what transport mitigation is necessary, how it will be funded and delivered, and the relationship between delivery and development. If further Junction 19 mitigation is necessary, the policy should contain effective delivery and phasing triggers. Any 60% active/sustainable travel assumption should be supported by a credible delivery mechanism and contingency if it is not achieved.

Sites 16A/16B question (h) - full range of development impacts

The Inspectors expressly identify agricultural land, rural landscape character and heritage assets; biodiversity and green infrastructure; flood risk; air quality, light and noise pollution; and other infrastructure

including education, health, utilities and recreation. These are the broader development impacts that must be assessed together, not reduced to highways or biodiversity alone.

Sites 16A/16B questions (i), (k) and (l) - mitigation, deliverability and modifications

Essential site-specific requirements and mitigation must be justified, viable and effective. Site 16A's delivery trajectory should be demonstrably aligned with infrastructure and mitigation. Where a phase depends on infrastructure or environmental safeguards that are not yet available, that phase should not proceed.

Modifications / outcome sought

- Require early assessment of environmental, ecological and other material development constraints.
- Secure avoidance and mitigation before development capable of material or irreversible harm.
- Identify infrastructure dependencies and binding delivery/occupation triggers.
- Require review where infrastructure or mitigation is delayed, materially altered or not delivered.
- Modify Policies 16A and 16B as necessary so development cannot proceed beyond the capacity of infrastructure and mitigation actually available.

Conclusion

The purpose of these changes is to ensure that the Plan is effective in practice: environmental and development impacts must be assessed at the appropriate stage, necessary safeguards and mitigation must be secured, and development must remain aligned with infrastructure and environmental capacity actually available.